

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of

COLUMBIA STUDENTS FOR JUSTICE IN PALESTINE,
COLUMBIA-BARNARD JEWISH VOICE FOR PEACE,
MARYAM ALWAN, and CAMERON JONES,

Petitioners,

-against-

TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY
OF NEW YORK, COLUMBIA UNIVERSITY IN THE
CITY OF NEW YORK, MINOUCHE SHAFIK, in her
official capacity as President of Columbia University in the
City of New York, and GERALD ROSBERG, in his official
capacity as Senior Executive Vice President of Columbia
University in the City of New York,

Respondents,

For a Judgment Pursuant to Article 78 of the Civil Practice
Law and Rules.

Index No.: _____

AFFIRMATION OF MARYAM ALWAN

I, Maryam Alwan, affirm on this 11th day of March 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

1. I am a 4th year student at Columbia University pursuing a degree in Comparative Literature and Society. I am 21 years old.
2. I am a member and organizer of Students for Justice in Palestine (“SJP”), a student organization at Columbia University. SJP was first recognized by the university in 2009, and it has maintained a presence on campus, with varying degrees of activism, for over a decade.
3. Since its formation, SJP’s goals have been to raise awareness and educate its members and the student body about the Palestinian history, culture and the struggle for freedom. SJP is also part of the Boycotts, Divestment, Sanctions (BDS) movement for Palestinian rights.
4. I joined SJP in the spring of 2023 because I am of Palestinian descent, and I feel that it is my duty to use my privilege in the United States to show the humanity of Palestinians and

to advocate for our rights worldwide—never more urgently so than during the current genocide, whereby over 30,000 Palestinians, 70% of whom are women and children, have been killed.

5. SJP is also part of a nationwide student movement advocating for Palestinian liberation, human rights, and self-determination.
6. As a political student group, SJP is recognized by and falls under the direct supervision of the Student Governing Board (“SGB”). SJP also directly interacts with its University of Student Life (“USL”) advisor, who, as of the fall 2023, it shared with Barnard-Columbia Jewish Voice for Peace (“JVP”). As a recognized student organization, SJP is entitled to a certain amount of funding every semester and is entitled to reserve space on Columbia’s campus for student group activities. SJP is also entitled to certain processes through the SGB and the Student Group Adjudication Board (“SGAB”) for adjudicating complaints about our student group, including, as I understand it, complaints that our group has violated university rules and policies. These processes include being provided clear notice of the alleged violation(s), supporting evidence, being assigned a representative for mediation, and afforded a hearing if mediation is unsuccessful.
7. SJP has a horizontal leadership structure where there are no officers, designated roles, or membership caps. Since the fall 2023 semester, we have held almost all event, media, and social media planning in conjunction with JVP because of our shared goals. SJP and JVP are both a part of Columbia University Apartheid Divest (“CUAD”), which is a coalition of student organizations that see Palestine as the vanguard for our collective liberation.
8. As of October 2023, SJP was an officially recognized and active student organization. On November 10, 2023, SJP was suspended and lost access to its funding, as well as other privileges. As of this date, while SJP maintains recognition, Columbia University has not yet lifted the suspension of SJP, nor returned any of its privileges.
9. As a member of SJP, I participate in the coordination of some actions and events, speak with university administrators and staff and make statements to the press on behalf of SJP, write op-eds, document instances of anti-Palestinian discrimination, among other things. I maintain access to SJP’s official email inbox, which is listed on the university’s website for student organizations, as well as our Instagram account.
10. Some of the events I’ve participated in with SJP over the past year and a half have been book clubs, film screenings, speaker events, protests, and vigils. For example, on Land Day,¹ SJP and the Muslim Students Association (MSA) jointly held a talk with Palestinian-American children’s book author Hannah Moushabeck. Last year, we also held a book club for Palestinian literature, where we would meet regularly and discuss the books together and engage in robust discussion. There has always been a fear of doxing and retaliation

¹ Land Day, March 30th, commemorates the 1976 protests of Palestinian people against widespread land confiscation by Israel which resulted in the killing of 6 protestors by Israeli police.

among members of SJP, which has shaped the way we approach anything public facing, including things as benign as a book club. Still, we have also done our best to not be completely held back by that fear, to still be outspoken when necessary, and to create a space where we continue to engage with and educate one another, and advocate for Palestinian rights.

My Experience on Campus—October 2023 to the Present

11. On October 17, 2023, I, along with other members of SJP and JVP co-authored an op-ed entitled “*Columbia you are failing your Palestinian, Muslim, Arab, Black, Brown, and Jewish student activists*” (Attached as **Exhibit A**).² In this op-ed, published in the Columbia Spectator, we detailed the experiences we had collectively faced on campus up to that point—amid the escalation of an ongoing genocide and ethnic cleansing of Palestinians in Gaza—including harassment, doxing, the administration’s disregard for our well-being and needs. It also detailed our experience working with the administration to organize a protest on October 12. Finally, it explained our joint principles and asks:

SJP and JVP are firm in our stance: As we grieve the unjust loss of innocent life, we acknowledge that the root of this violence is oppression. We ask everyone to consider the context of the past 75 years and we compel you to acknowledge, as we do, that a history of brutal occupation has culminated in this moment. We ask that it be acknowledged that the Palestinian community’s daily losses often go unnoticed, afforded no media attention, schoolwide statements, or any form of recognition. We ask students to critically examine why these statements are only made in explicit support of Israel and only after Palestinians retaliate.

12. Although the infamous doxing trucks³ had not yet arrived on Columbia University’s campus by this point, I and many other students were already operating in complete fear due to the actions (and inaction) by the university, including regarding an unidentified administrator at Columbia’s uptown Medical Center who had said “I hope every one of these people die” while standing near an on-campus protest in support of Palestinian lives on October 12—as well as the threats that SJP’s social media and email accounts had directly received and that I was monitoring. Personally, I had begun avoiding campus or otherwise wearing a mask to protect my identity. I had also deleted or deactivated my personal social media accounts and I had largely stopped wearing my keffiyeh (Palestinian scarf) in public.

² SJP and JVP, *Columbia, you are failing your Palestinian, Muslim, Arab, Black, Brown, and Jewish student activists*, Columbia Spectator (Oct. 17, 2023) <https://www.columbiaspectator.com/opinion/2023/10/17/columbia-you-are-failing-your-palestinian-muslim-arab-black-brown-and-jewish-student-activists/>

³ By this point, doxing trucks had begun appearing on college campuses across the country. They include advertising screens with the photos and personal information of individuals who support Palestinian rights, labeling them as antisemites and pro-terror. The trucks often include a digital code and URL, which allow people to access a website that broadcasts further private, personal information about that person. The impact of an individual being placed on these trucks and disingenuously labeled antisemitic for supporting Palestinian rights have ranged from criticism, lost professional and academic opportunities, surveillance, hate mail, and death threats.

13. In a meeting on October 16, I warned administrators of the likely arrival of these trucks and asked that measures be put in place to protect us. I also informed them about the terror list google site,⁴ which had already been used to dox members of the Muslim Students Association, explaining that members on that site were actively searching for the personal information of SJP and JVP members to broadcast the same. In response, I was simply advised to change my phone number and attend Barnard's "Tea on Tuesdays" programming.
14. On the night of October 18th, Dar (the Palestinian Student Union) hosted a vigil for Palestinian lives lost in Gaza. At the same time, there was a pro-Israel "counter-vigil" outside of Butler Library. We were having an SJP meeting in Lerner Hall—the building next door—and found it difficult to focus. One of our members came running in and warned us that a man outside was yelling about us. I feared for our safety and asked everyone to take off their keffiyehs. It was so loud that we ultimately became scared and left through the back door of the building. Later, we found out that the commotion had been from Columbia professor Shai Davidai who had made several harmful, false statements about SJP and JVP, claiming that we celebrated rape and terrorism and saying that we must be "eradicated from campus." The State of Israel subsequently posted this video on their Instagram account.⁵
15. On or about November 7th, I saw on X (the social media platform formerly known as Twitter) that Prof. Davidai was directing people to his personal site "Timetocondemn.com" which included a take action page which prominently posted "CLICK TO SEND COLUMBIA UNIVERSITY AN EMAIL DEMANDING THE PERMANENT REMOVAL OF PRO-HAMAS ORGANIZATIONS FROM CAMPUS!" The website took users to a pre-filled email addressed to Columbia University President, Provost and cc'd Fox News. The pre-filled email demanded that Columbia ban SJP and JVP from campus. The site made multiple references to SJP and JVP, falsely and disingenuously claiming that these groups are antisemitic and pro-terror. As early as October, Davidai had used his large social media following to continuously direct members of the public to send complaints to Columbia University demanding the ban of SJP and JVP and frequently referring to us as "pro-terror organizations."
16. The night of November 8th, I watched and re-shared Instagram video posts of Congresswoman Rashida Tlaib's speech on the House floor, a displaced Palestinian child holding his frightened cat, and a press conference of children at Al-Shifa Hospital in Gaza reading from a piece of paper in English, pleading for protection. I lamented the fact that it seemed as if Palestinian people needed to prove their humanity in order to survive. Regarding Tlaib's speech, I wrote on my Instagram page that "we are out here begging and

⁴ This google site was known for falsely labeling individuals as "supporting terrorists" and shared those individuals' personally identifying information.

⁵ <https://www.instagram.com/reel/CylsaTkrKkU/?igsh=MzRIODBiNWFIZA==>

groveling for empathy and trying to prove our worth, using our American-ness to appeal to the public and say, ‘See, I’m Palestinian and I’m human, so you have to see that the people in Gaza are human too!’ knowing full well they couldn’t care less about either of us.”

17. I also reshared one Instagram post stating, “The men of Palestine are not mere numbers. The men of Palestine are brave, kind, and gentle. The men of Palestine are human. The man who smiled at a child even after losing his own. The man who played with a baby amidst the rubble. The man who comforted the only survivor of his neighbor’s family,” and another saying, “Don’t forget the 25,408 Palestinians who have been injured in Gaza this last month. It is impossible to wrap your head around this number. How many limbs have been amputated without anesthesia? How many were killed, not by the impact of the bomb, but by its aftermath? How many of those 25,408 will survive their maims? How many of them could have survived if hospitals had proper medical equipment, fuel, and electricity? Think about the horror of not only being directly injured but ‘healing’ from those injuries without food or water. Starving and dehydrated during immense physical (and psychological) trauma. This assault on Gaza doesn’t end with a ceasefire. This genocide extends well beyond, deep into the future.”

November 9th, 2023 Peaceful Demonstration and Temporary Art Installation for Palestinian Lives

18. On November 8th at 8:34am, I was BCC’ed in an email from Ms. Whalen-Turini to some SJP members, wherein she inquired about a CUAD demonstration SJP and others had promoted, to take place that afternoon. Ms. Whalen-Turini cc’ed SGB leadership, Barnard Dean Youngblood-Giles, and Barnard Dean Grinage, “hoping they can encourage and/or compel [SJP] to meet today and/or postpone this event so that you can schedule it aligned with University policy.” (Attached as **Exhibit B** is this email from Ms. Whalen-Turini). I responded that I was not involved in the planning of this demonstration and that I was trying my best to get back on track academically. This email caused me severe distress and I did not sleep the night before the demonstration.
19. At 1:30pm on November 9th, I met with the GS Assistant Director of Student Support, Kristen Henlin. This was my first time revealing my involvement with SJP to my school, the School of General Studies. I remember crying about consistently being profiled as a terrorist and iterating my fear of being doxxed by someone within the administration. During this meeting, I debated whether or not I would attend the protest because I did not want to face sanctions from the administration for showing my support for Palestinian human rights. I ultimately went directly to the protest right after the meeting because I decided that the need to draw attention to the lives lost was far more important than any consequences for myself.

20. Around 2p.m., hundreds of Columbia and Barnard students participated in the demonstration organized by Columbia University Apartheid Divest coalition members gathering on the Low Steps.
21. The art installation included 5 large plywood panels leaning on the Low Steps with paintings on them. Below is a true and accurate depiction of the five large plywood panels taken on November 9th by a reporter at the Columbia Daily Spectator. (Attached as **Exhibit C** is the Columbia Spectator article, which I believe provides a fair and correct description of the demonstration on November 9, 2023).⁶



22. On the first panel was a list of our demands: “1. Publicly Call for a Ceasefire; 2. Call it [the ongoing genocide in Gaza] a Genocide; 3. Cancel TLV [referring to Columbia’s upcoming Tel Aviv Global Center]; 4. Divest from Apartheid; 5. No more dual degree [referring to Columbia’s dual degree program with Tel Aviv University].”
23. On the second panel was the painting of a tree with “10,600 Lives Slaughtered” at the base of the tree referring to the death toll in Gaza as of November 9th, which has now tripled. Along the branches of the tree were the death tolls of Journalists, Children, Women and UN staff in Gaza. The top of the panel said, “When the dust settles and the dead are buried, can you look the living in the eye and say what you did was right?” On the third panel was a painting of the Columbia Alma Mater statue holding a Palestinian flag. On the fourth and fifth panels were other small drawings including “from the river to the sea” in Hebrew, “Let Gaza Live,” and “forgive me, my children, if it were in my hands I would have protected you and kept you in my arms: Palestinian mother Asmaa Mughar’s tribute to her two children who were killed by an Israeli airstrike.”

⁶ Chris Mendell, *Hundreds of pro-Palestinian students peaceful protest art installation*, Columbia Spectator (Nov. 9, 2023) <https://www.columbiaspectator.com/news/2023/11/10/hundreds-of-pro-palestinian-students-walk-out-as-part-of-national-call-to-action-gather-for-peaceful-protest-art-installation/>

24. Because we intended for the art installation to be a place of peaceful contemplation and protest, we placed “Remain Quiet Please” signs along the floor of the panels for the silent portion of our protest. And while the vigil began silently, after 20 minutes or so, it naturally shifted to speeches and chants. Students also hand wrote the names of Palestinians who had been killed onto a piece of plywood.
25. Another student read out loud the email that CUAD had sent to administrators earlier that day, wherein we affirmed that a coalition of over 20 student groups had organized this demonstrated and expressed our concerns with the strict 10-day event policy, which we felt was being implemented to prevent advocacy supporting Palestinian rights.
26. We chanted things like “Stop bombing Gaza,” “The people united will never be defeated,” “Ceasefire now,” “End the aggression, stop the crime, Israel out of Palestine,” “Hey hey, ho ho, the occupation has got to go,” “Not a penny, not a dollar, we won’t pay for any more slaughter,” “From the river to the sea, Palestine will be free,” “Fight the mainstream, turn the tide, Columbia stands with apartheid,” “We want justice, you say how? End the siege on Gaza now,” and “End the occupation now, divest, divest from Israel now.”
27. At the end of the demonstration, protesters staged a die-in, a form of silent protest where one lays on the floor pretending to be dead, to symbolize the Palestinian lives that had been lost since the genocide began.
28. I thought that the protest was cathartic because of the artwork, the powerful impact of the speakers, and the opportunity to come together in shared grief for the lives lost at the same time as we demanded Columbia change their position. Immediately following the protest, a student who I did not know hugged me and we expressed gratitude to each other.
29. Despite this gratitude, there were also aspects of the protest that reminded us of the ongoing surveillance and resistance by the administration to our advocacy efforts. For example, by this time, Columbia University had barricaded the Alma Mater in anticipation of this and other demonstrations. There was also a large NYPD presence, which I understand the administration later acknowledged was brought on without consultation with the University Senate. I recorded a video of President Minouche Shafik standing by a window in Low Library and staring at us. I also took a video of Vice President Gerald Rosberg (“VP Rosberg”) standing with a group of counter-protestors who were holding a poster saying “no ceasefire until the hostages are returned and hamas is destroyed” with his arms crossed, as I had seen him doing at every other protest prior. In fact, at the October 25th protest, I had personally tried to hand VP Rosberg a handout with our four demands, chants, and a barcode to call representatives for a ceasefire, to which he responded, “I’m not interested,” with a look of disgust. At the protest on October 12th, I took a photo of him standing with his arms crossed and smirking next to a counter-protestor who had a sign saying, “You are Nazis,” and overheard him say, “This [the protest] has gone so far beyond what is appropriate” to my Palestinian friend without explaining what he meant.

November 10th Suspension of SJP and JVP

30. Around 1:18 PM on November 10th some members of SJP and JVP received an email from Cristen Kromm signed by VP Rosberg and on behalf of a “Special Committee on Campus Safety,” informing them that Columbia was suspending our student organizations because we had ‘repeatedly violated’ event policies and had held an unauthorized protest that used ‘threatening rhetoric and intimidation.’
31. Although I had never heard of this “special committee,” I had been warned by Ms. Whalen-Turini in a meeting on October 11th about a so-called “protest shutting down committee,” that had apparently been meeting daily trying to figure out how to shut down our planned October 12 protest due to PR concerns and one of President Minouche Shafik’s Inaugural Symposia events that was scheduled at the same time. When I saw the suspension notice, I realized that “special committee” may be the committee Ms. Whalen had mentioned.
32. It was our understanding that violations of the university events policy would be handled by the SGB or the SGAB and would include an investigation, mediations, and possibly a hearing before any type of sanction was imposed on our student group. This understanding seemed to have been acknowledged by university staff in the recent emails we had received, too (attached as **Exhibit D** is an email SJP received on November 7, 2023, from USL Executive Director Aaron Gomes, reminding the recipients that student groups recognized by SGB who are “alleged to have violated university event policies” may be referred to their governing board or the SGAB).
33. At 2:02 PM, the SJP email inbox received an email request from the Israeli Newspaper Haaretz asking for a comment on the SJP suspension. I was surprised by this because, at the time, there had not been any public, official announcement of the suspension to our knowledge. Over the next hour or so, our inbox received multiple press inquiries, including from Hellgate, the Jewish Insider, and USA Today, all asking for comment on our student group suspension. The Instagram account, “IsraelWarRoom,” also posted a leaked version of the email that our student groups had received, writing in the caption: “Thank you, Columbia for finally taking some initial steps to address terror-supporting groups on campus. We expect further action to combat the rampant Jew-hatred on campus.”⁷
34. At 2:32 PM, I saw the school-wide post on the University website announcing that we had been suspended. The announcement repeated the language in the email we had received in the prior email.
35. The rapid succession of the suspension email, press inquiries and immediate public announcements were shocking as they felt simultaneous and gave us little opportunity to process what was happening and figure out how to respond. It was personally very

⁷ <https://www.instagram.com/p/CzekXHpvvQB/?igsh=MWoxZW93end1cGJxdQ==>

alienating to have our peaceful demonstration with an art piece to which we had devoted a lot of time be described as intimidating and threatening in public and it has negatively affected the image of SJP, JVP, and our members.

November 30th Meeting with Vice President Gerald Rosberg

36. On November 30th, I attended a meeting, on behalf of SJP, with VP Rosberg, Vice President Joseph Greenwell, and USL Dean Cristen Kromm. Also present in that meeting were Cameron Jones as a representative of JVP, chair of the University Senate Executive Committee Dr. Jeanine D'Armiento, University Senators Jalaj Mehta and Jaxon Williams-Bellamy, Professor Katherine Franke, and Professor Joseph Slaughter, whom we had invited to the meeting to provide us with institutional support. This meeting was recorded.
37. Dean Kromm acknowledged that she and her office (USL) were not involved in the suspension decision.
38. On multiple occasions throughout the meeting, VP Rosberg admitted that our groups had not violated the University Code of Conduct.
39. I asked VP Rosberg why the Special Committee on Public Safety would post on the website that we had used "threatening and intimidating language" if it is subjective. He responded "I'm saying rhetoric is intimidating based on how it is perceived by the people who hear it. And I believe that a lot of what is said on both sides is perceived as intimidating by people on both sides." It was absolutely appalling to me that legal terms cited by human rights organizations including Human Rights Watch, Amnesty International, and B'tselem were deemed intimidating.
40. In that meeting I specifically asked VP Rosberg if there had ever been an instance in which a club had been suspended and it was immediately publicly posted on the website as opposed to handling the group internally. He did not respond to this question. I explained that this public announcement of our suspension had given the perception that we were a bunch of animals or are super violent and could not possibly be on campus. VP Rosberg declined to explain what drove him to make those comments.
41. Later in the meeting, I asked VP Rosberg why SJP and JVP had been singled out for suspension when multiple other organizations were members of CUAD and over 20 organizations had signed the November 8th letter criticizing the application of the 10 business day notification period and expressing their intent to go ahead with the November 9th protest.
42. To my knowledge, no other student groups associated with the November 9th walkout had been threatened with discipline or suspended. I also expressed my concerns that the difference between vigils and demonstrations was unclear and being used against us and JVP. At all of our protests we had also been grieving and showing solidarity for Palestinian

people within our speeches. I compared it with SSI vigils which similarly had moments where people were yelling and chanting but were not considered demonstrations.

43. Towards the end of the meeting University Life Vice President Greenwell told us that he “thought you all did an incredible job with that big protest” referring to our protest on October 12th.
44. At the end of the meeting, it was not clear to me what was expected of us to lift the suspension. We asked for a public apology, a statement from the administration acknowledging that we had not violated the rules or engaged in harassing behavior, and an opportunity to meet with President Shafik.

January 8, 2024, Meeting with Dean Kromm

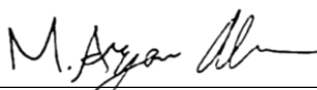
45. On January 8, 2024, members of SJP and JVP (including myself), had a meeting with Ms. Whalen-Turini, chair of the SGB Executive Board and SGB delegate to the Student Group Adjudication Board (SGAB) Yanni Kent, USL Dean Kromm, and Executive Director of Student Engagement Aaron Gomes. One of the students recorded this meeting.
46. The goal of this meeting was for us to try and understand what the steps would be in order for SJP and JVP to be reinstated.
47. Dean Kromm told us that things last semester had happened outside of the normal protocol. She also admitted that the confusion in the application of the university’s rules might be due to the recent “change in leadership,” which I understood to be a reference to newly instated President Shafik.
48. Dean Kromm also admitted to us that SJP and JVP were not the only student groups that had apparently violated event policies. Specifically, she stated that last semester, with respect to student groups that fall under Undergraduate Student Life, “I do think there were a number of times in the fall semester that groups were advertising events and saying that they had space confirmed before going through, really, a process with their advisor.”

Impact of Suspension on SJP

49. The suspension has had an impact on the ability of SJP and its members to organize in solidarity with Palestine and the Palestinian people by preventing us from accessing university funding and booking university space, which we would use to coordinate events and to provide our community with a space for people with shared values and ideas.
50. The suspension has also had a negative impact on our public perception. The very public suspension notice, which described our November 9th event as “threatening” and “intimidating,” has caused us to be inundated with racist anti-Palestinian and Islamophobic hate comments, posts, and death threats, both individually and as a student group. This language further perpetuates the narrative that Palestinians or advocacy for their rights is threatening and intimidating. I have personally internalized and grappled with this harmful

label as part of my own self-perception, and I feel that I have been put in a position where I am forced to choose between my own identity and moral values, and my status at school.

51. For me as a Palestinian-American student, the suspension of SJP has had an especially negative effect on me by preventing me from being able to share my grief, frustration, and pervasive anxiety over the deaths of thousands of Palestinian people without fear of retaliation. I joined SJP because I felt that I had a personal duty to stand up for the rights of my people; this was intensified as the current bombardment and dehumanization campaign began. By unilaterally and illegitimately suspending our student groups, Columbia sent the message that those who vocally support Palestinian rights will not be protected by the school and are in fact a “threat” to be neutralized. I believe that this has in fact emboldened harassment and violence against us. Attached as **Exhibit E** is an op-ed I wrote in the Columbia Spectator, published on January 31, 2024, entitled, “(Pro-)Palestinian lives do not matter to Columbia University” wherein I talked about my experiences.⁸
52. The suspension and its aftermath have made me feel uncomfortable, unsafe, and unwelcome on my own campus to an unprecedented degree. The suspension has also drawn a significant amount of media attention and, in doing so, has made me feel like every move that I make is being watched and that anything SJP posts on social media or does will receive instant attention and backlash beyond the Columbia community. I no longer trust the administration; and I no longer feel like I have a place at Columbia at all.


Maryam Alwan

⁸ Maryam Alwan, *(Pro-)Palestinian lives do not matter to Columbia University*, Columbia Spectator (Jan. 31, 2024) <https://www.columbiaspectator.com/opinion/2024/01/31/pro-palestinian-lives-do-not-matter-to-columbia-university/>